

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA :  
:  
:  
v. : NO: 1:04-CR-10231-006-MLW  
:  
MICHAEL O'NEILL :

**DEFENDANT O'NEILL'S OBJECTION TO**  
**ANSWER OF GARNISHEE (VANGUARD)**  
**AND MOTION TO QUASH WRIT OF GARNISHMENT**

Now comes the defendant, Michael R. O'Neill, who respectfully files this  
Objection to the Answer of the Garnishee, Vanguard Group, and further moves to quash  
the Writ of Garnishment as follows:

1. Defendant has requested a hearing and a change of venue.
2. Defendant asserts that for the reasons set forth in the attached  
Memorandum of Law, the property at issue should not be subject to garnishment.

WHEREFORE, Defendant Michael R. O'Neill, respectfully requests that the Writ  
of Garnishment be quashed.

Respectfully submitted,  
By his attorneys:

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Dated: May 31, 2007

CERTIFICATE OF SERVICE

We, Joseph S. Oteri, and Joseph M. Toddy, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 31, 2007.

/s/Joseph S. Oteri

Joseph S. Oteri

/s/Joseph M. Toddy

Joseph M. Toddy